

United States District Court

NORTHERN DISTRICT OF

UNITED STATES OF AMERICA

TEXAS
CLERK, U.S. DISTRICT COURTBy  DeputyFILED
SEP 18 2015

V.

COMPLAINT

JENNIFER LYNN DOUGHERTY

CASE NUMBER: 3-15-MJ- 677-BN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 12, 2015, in the Dallas Division of the Northern District of Texas, defendant(s) did,

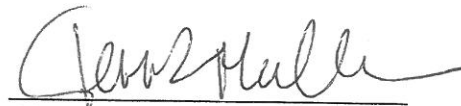
knowingly transported an individual who had not attained the age of 18 years in interstate or foreign commerce, with intent that the individual engage in sexual activity for which any person can be charged with a criminal offense,

in violation of Title 18, United States Code, Section(s) 2423(a).

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Jennifer Mullican, (FBI) which is incorporated and made a part hereof by reference.

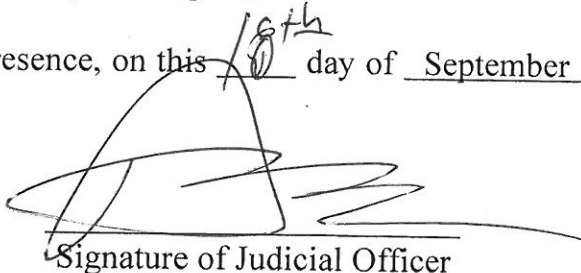
Continued on the attached sheet and made a part hereof: XX Yes No



Signature of Complainant
JENNIFER MULLICAN
Special Agent, FBI

Sworn to before me and subscribed in my presence, on this 18th day of September, 2015, at Dallas, Texas.

DAVID L. HORAN
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jennifer Mullican, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since October 2003. During my time as a Special Agent, I have investigated cases involving public corruption, white-collar crimes, and violent crimes. I am currently assigned to the FBI's Child Exploitation Task Force, Dallas Division, Dallas, Texas. As a FBI Special Agent, I am authorized to investigate violations relating to the Sexual Exploitation of Children (SEOC). I have gained experience in conducting these investigations through training and through everyday work, including executing search warrants and interviewing individuals who knowingly engage in offenses involving child exploitation.

2. This affidavit is submitted for the limited purpose of establishing probable cause to believe that Jennifer Lynn Dougherty (Dougherty), while in the Northern District of Texas (NDTX) and elsewhere, knowingly transported an individual who had not attained the age of 18 years in interstate or foreign commerce, with intent that the individual engage in sexual activity for which any person can be charged with a criminal offense, in violation of 18 U. S. C. § 2423(a).

3. The statements contained in this affidavit are based on my own personal knowledge and observations, my training and experience, and conversations with and reports from other law enforcement officers and witnesses. Because this affidavit is

being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that Dougherty, did knowingly violate 18 U.S. C. § 2423(a).

FACTS SUPPORTING PROBABLE CAUSE

4. On or about September 12, 2015, the Garland Police Department (GPD) was notified of a missing 14-year-old male by his parents. Subsequently, the Youth Services Division of the GPD was notified of these circumstances and initiated a missing/endangered child investigation.

5. The family of the missing child reported to the GPD that the child is a heavy online gamer and regularly visited with friends in the neighborhood to play games but would return before dark. On the date of their report to the GPD, the missing child did not return home before dark and had not visited his friend's residence that day as he had earlier advised. In support of the investigation, the parents of the victim provided the GPD with electronic evidence belonging to the 14-year-old missing child.

6. Upon receiving consent from the parents of the missing child, a manual review was conducted upon an X-Box 360 gaming system utilized by the missing child. Upon review of the contents of the X-Box 360 gaming system, GPD detectives noted chat communication between the missing child, as user "Bragi," and other online gamers.

7. Specifically, GPD detectives reviewed chat communication between "Bragi" and another user, "xXJennLynn81Xx" which occurred from August 24, 2015

through August 28, 2015. The contents of the chat communication showed that “Bragi” and “xXJennLynn81Xx” were involved in a relationship. The communications were sexual in nature and discussed “xXJennLynn81Xx” visiting Dallas, Texas, to spend time with “Bragi” and to do some sightseeing around town. “Bragi” told “xXJennLynn81Xx” that he loved her and that he wanted to move with her. She replied to “Bragi” that she would love him forever and that she promised to never leave him. During the course of their communication, “xXJennLynn81Xx” called “Bragi” by the name “Shaun” and “Bragi” replied and called “xXJennLynn81Xx” by the name “Jennifer.”

8. Furthermore, a manual review of the X-Box revealed the following conversation on August 27, 2015, between “xXJennLynn81Xx” and “Bragi”:

Bragi: wks up

xXJennLynn81Xx: Good Morning, Baby <3

Bragi: gd morning my love

xXJennLynn81Xx: How’d you sleep”

Bragi: gd, picks u up

xXJennLynn81Xx: Wraps my arms around your neck

(General comments about going to work and finding a movie.)

xXJennLynn81Xx: You’re cute lol

Bragi: ur beautiful

xXJennLynn81Xx: Looks into your eyes kissing you

Bragi: kisses u bk

xXJennLynn81Xx: curls up close to you wrapping my arm across your waist

Bragi: pulls u on me

xXJennLynn81Xx: kisses you again

Bragi: kisses u bk

xXJennLynn81Xx: takes your shirt off feeling your chest with my hands

Bragi: tks ur shirt off

xXJennLynn81Xx: runs my hands down your chest unbuttoning and removing
your pants

Bragi: tks ur pants off

xXJennLynn81Xx: do you want to fk this morning

Bragi: do u want to

xXJennLynn81Xx: I want to yes hbu

Bragi: yea

xXJennLynn81Xx: slides my hand in your pants grabbing onto your cock jerking
you off

Bragi: starts to finger u

xXJennLynn81Xx: continues jerking your big thick cock off faster and harder

Bragi: goes deeper

xXJennLynn81Xx: moans as I stroke your cock harder tightening my hand around,
leans over as I stroke your cock sucking your balls in my mouth licking up your

shaft and around the tip of your cock, slides your cock deep into my mouth
sucking your hard

Bragi: mouth fks u

xXJennLynn81Xx: gags on your cock as I slide him deeper sucking your cock
harder

Bragi: pounds ur mouth harder

xXJennLynn81Xx: sucks you harder and deeper feeling your balls slap my chin

Bragi: cums

xXJennLynn81Xx: lays back next to your looking back into your eyes

Bragi: looks into ur beautiful eyes

xXJennLynn81Xx: holds you again

9. Additionally, after “Bragi” returned home from school,
“xXJennLynn81Xx” and “Bragi” engaged in the following conversation:

xXJennLynn81Xx: Welcome home

Bragi: I missed you

xXJennLynn81Xx: I missed you too

Bragi: picks u up

xXJennLynn81Xx: wraps my arms around your neck

Bragi: lol do u want me to do this to our babies when we start a family

xXJennLynn81Xx: you can if you want to or I can

Bragi: I will

xXJennLynn81Xx: ok you can <3

10. Their chat conversations also showed that “xXJennLynn81Xx” told “Bragi” that she made the decision that day to come see him again and “xXJennLynn81Xx” asked “Bragi” if he was excited to see her again. When “Bragi” replied he was excited, “xXJennLynn81Xx” asked if they were going to have sex again. “Bragi” replied yes and “xXJennLynn81Xx” asked if it does happen would they use a condom or not. “Bragi” replied they would not use a condom and “xXJennLynn81Xx” stated she just wanted to know if she should pack some just in case. “Bragi” replied, “k, and lol get u prego.” “xXJennLynn81Xx” then stated that she wanted a family with “Bragi” and he replied, “idt” to which “xXJennLynn81Xx” replied, “even at 15 you want a family still?”

11. Also, “xXJennLynn81Xx” commented that she wanted to kidnap “Bragi” because she was having a hard time locating a hotel in Dallas that would allow her to be close to “Bragi” and would also allow her to sightsee around Dallas.

12. GPD detectives noted that “xXJennLynn81Xx” was aware that “Bragi” was a minor due to her comment that she was up “gaming” all night and that she would sleep while “Bragi” was in school. Also, she asked him if he wanted a family even though he was only 15. Of further concern for GPD detectives was “xXJennLynn81Xx” commented that she had to work for the next seventeen days straight with no day off. This information led GDP detectives to believe “xXJennLynn81Xx” was an adult female communicating with the missing child.

13. On or about September 14, 2015, the GPD contacted the National Crime Information Center (NCIC) and entered the victim into the database as a missing juvenile.

14. On or about September 16, 2015, officers of the Dallas Police Department (DPD) assigned to the Dallas Love Field Airport, Dallas, Texas, contacted NCIC regarding the missing child. DPD advised NCIC they had an individual matching the missing child's description, however the child was using the last name of "Cook." Additionally, DPD advised NCIC that the child was in the company of an adult female, Jennifer Dougherty, and that the two were attempting to travel to Wisconsin. Subsequently, DPD contacted GPD dispatch with this information.

15. Upon receipt of this information, GPD detectives traveled to the Love Field Airport and retrieved the missing child and adult female. Dougherty was arrested by the GPD for Harboring a Runaway and subsequently transported to jail in Garland, Texas. GPD detectives returned to the Garland Police Department with the missing child.

16. Shortly after arrival at the Garland jail, Dougherty was interviewed by the GPD subsequent to waiving her Miranda warning. During the interview, Dougherty advised she met the boy, herein identified as D.M., while playing online games. Dougherty provided her gaming name as: "xXJennLynn81Xx." Dougherty and D.M. met in approximately November 2014. Dougherty stated that after a few months they became closer friends and D.M. became her "guardian angel" and looked out for her because she suffered from depression.

17. Furthermore, Dougherty stated that in approximately May 2015, that she and D.M. began expressing their feelings for one another. At the time, D.M. told Dougherty that he was 16 years old and would turn 17 in December. Dougherty and D.M. began “sexting” online which eventually led to them sharing nude photographs of their private parts using their gaming consoles. Dougherty sent images of a woman’s genitals and breasts that she found over the Internet but that D.M. sent her images of his genitals.

18. Additionally, in or around July 2015, Dougherty and D.M. began utilizing the software program Skype to communicate. Dougherty admitted that both she and D.M. would masturbate for one another using Skype.

19. On or around August 11, 2015, Dougherty traveled to Dallas, Texas, from her home in Wisconsin, and picked up D.M. from his residence in Garland, Texas. Dougherty advised that she took D.M. to a Super 8 Motel in Garland, Texas, and that the two had sexual intercourse multiple times. Dougherty and D.M. also performed oral sex upon one another. Dougherty spent only a few hours with D.M. in the motel before she returned D.M. to his residence out of fear if D.M. was late that his parents would start to look for him.

20. Upon Dougherty’s return to Wisconsin after the August 11, 2015 visit, Dougherty and D.M. continued to “sext” with one another and Dougherty agreed to return to Dallas for D.M.

21. On or around September 12, 2015, Dougherty traveled from Wisconsin to

Dallas and picked up D.M. from his residence. Dougherty parked a short way away from D.M.'s residence and called D.M. to meet her where she was parked on Tensley Drive. Dougherty then took D.M. to the Wingate by Wyndham Hotel in Richardson, Texas, where the two stayed from that Saturday through Monday, September 14, 2015. While staying at the hotel, Dougherty and D.M. had sexual intercourse and performed oral sex upon one another.

22. On or around September 14, 2015, Dougherty traveled with D.M. via airplane to Chicago, Illinois, and then drove to her residence in Janesville, Wisconsin. Dougherty had purchased the plane ticket for D.M. D.M. stayed with Dougherty at her residence in Wisconsin on Monday and Tuesday before returning to Dallas on Wednesday, September 16, 2015. While at her residence in Wisconsin, Dougherty and D.M. engaged in sexual intercourse multiple times.

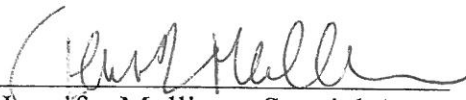
23. Upon meeting with D.M. on September 12, 2015, Dougherty told D.M. to turn off his cellular telephone because she knew D.M. was a "runaway" and that the police would be called and Dougherty did not want the police to track D.M.'s cellular telephone.

24. Lastly, while together in Wisconsin, Dougherty and D.M. observed his X-Box account was active and feared it was the police beginning to look for D.M. This scared Dougherty so she began booking airline tickets to return D.M. to Dallas, Texas. GPD detectives confiscated from Dougherty: two Apple iPhones, a Kindle tablet, and airline tickets/boarding passes for Dougherty and D.M., although D.M.'s airline ticket

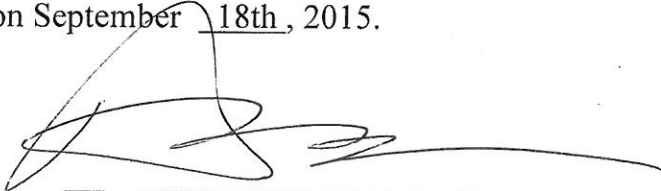
was in an alias name.

CONCLUSION

25. Based upon the aforementioned, your Affiant respectfully submits that there is probable cause to charge that the defendant, Jennifer Lynn Dougherty, knowingly transported an individual who had not attained the age of 18 years in interstate or foreign commerce, with intent that the individual engage in sexual activity for which any person can be charged with a criminal offense, in violation of 18 U. S. C. § 2423(a). I therefore respectfully request the Court issue a warrant authorizing the arrest of Dougherty.


Jennifer Mullican, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on September 18th, 2015.


HONORABLE DAVID L. HORAN
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS